

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION-DETROIT**

In Re:
Melissa Ann Vann

Chapter 13
Case No.: 22-46542
Judge: Mark A. Randon

Debtors.

CHAPTER 13 PLAN MODIFICATION

DEBTOR, by and through her Attorney, states the following in support of this plan modification;

1. Debtor is in a Chapter 13 plan that was confirmed on November 11, 2022.
2. Debtor's plan as confirmed runs 36 months and pays nothing to unsecured creditors.
3. Debtor recently changed jobs and lost about 3 weeks income.
4. Debtors' Ch. 13 Plan includes a provision that Debtor will remit 100% of all Federal Tax Refunds that debtor receives or is entitled to receive after commencement of the case to the extent the Refund exceeds the sum of twelve times the amount of the Federal Tax Refund pro-ratio shown in Schedule I
5. Debtor received a Federal Tax Refund of \$8,927.
6. Debtor's Schedule I includes \$400 income prorated from the expected refund.
7. $\$8,927 - (12 * 4)$ would leave \$4,127 to be turned over.
8. Debtor reports that her vehicle needs significant repairs including "brakes alignments tires and rotors totaling about \$3,450."
9. Debtor reports that she is two months behind in her \$1,200 monthly rent and needs \$1,200 to pay the current month's rent.
10. The plan if amended would still not pay unsecured creditors anything.
11. The effect of this plan modification on creditors will be as follows:

Class One-	No effect.
Class Two-	No effect.
Class Three-	No creditors of this class are in this case.
Class Four-	No payments would be made to creditors.
Class Five-	No payments would be made to creditors.
Class Six-	No payments would be made to creditors.

Class Seven- No creditors of this class are in this case.

Class Eight- No creditors of this class are in this case.

Class Nine- Creditors will still receive the same amount as confirmed.

WHEREFORE, it is requested that Debtor's confirmed plan be modified to excuse turnover of the 2023 Federal Tax Refund.

Dated June 17, 2024

/s/ John Robert Keyes

Attorney for Debtors

Robert Keyes Law, PLLC

300 North Huron Street

Ypsilanti, MI 48197

(734) 662-1590

robert@robertkeyeslaw.com

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Notice of Deadline to Object to Proposed Chapter 13 Plan Modification

The deadline to file an objection to the attached proposed chapter 13 plan modification is 21 days after service.

If no timely responses are filed to a proposed post-confirmation plan modification, the proponent may file a certificate of no response and request entry of an order approving the plan modification.

If a timely objection is filed, the Court will set the matter for hearing and give notice of the hearing to the debtor, the proponent of the plan modification, the trustee and any objecting parties. In that event, the plan modification will become effective when the Court enters an order overruling or resolving all objections.

Objections to the attached proposed chapter 13 plan modification shall be served on the following:

Robert Keyes 300 North Huron Street Ypsilanti MI 48197
Krispin Carroll 719 Griswold, Suite 1100 Detroit MI 48226

Dated: June 17, 2024

/s/ John Robert Keyes
Attorney for Debtors
Robert Keyes Law, PLLC
300 North Huron Street
Ypsilanti MI 48197
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ORDER MODIFYING CONFIRMED PLAN

This matter having come before the Court upon the application of Robert Keyes, of Robert Keyes Law, PLLC, and all interested parties having been served with notice of the modification, no objections to the modification having been received and a certification of no response having been filed, and the Court being otherwise fully advised in the premises.

IT IS HEREBY ORDERED that turnover of the 2023 Tax Refund is excused.

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**PROOF OF SERVICE OF DEBTORS' POST-CONFIRMATION CHAPTER 13 PLAN
MODIFICATION**

The undersigned hereby states that he did serve the **Debtors' Post-Confirmation Chapter 13 Plan Modification, Notice of Plan Modification, Proposed Order and Proof of Service** via the courts Electronic Case Filing System or First Class U.S. Mail upon the following:

****SEE ATTACHED MATRIX****

Dated: June 18, 2024

/s/ Robert Keyes
Attorney for Debtors
Robert Keyes Law, PLLC
300 North Huron Street
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